

Comments on the December 2014 draft EE/CA for the Johnny M Uranium Mine Site

Generally speaking, I am supportive of the recommended removal action alternative of on-site consolidation of the mine wastes. However, the document identifies two potential repository locations but does not provide criteria/explanation for the selection of one location over the other. Regarding land use controls, I am ignorant of whether an enforceable institutional control is possible in the state of New Mexico.

With respect to the two onsite water treatment ponds, I thought there was to be an investigation/evaluation of the efficacy of the covers that were constructed post mining. The draft EE/CA does not provide any details about the ponds much less evaluate removal action alternatives for the ponds.

It is my understanding that the "Analysis of Groundwater Conditions at the Former Johnny M Mine, McKinley County, New Mexico" was submitted unsolicited. This analysis is based on a review of existing geologic, hydrogeologic, and geochemical data related to the Johnny M mine area. Although I have serious reservations regarding many of the conclusions reached with respect to mining activities impact historically and currently on the alluvial and deeper groundwater, I will not provide specific comments on the analysis.

I do, however, take issue with the fact that in the conceptual site model in the draft EE/CA the soil to surface water pathway was not included based on the "Analysis of Groundwater Conditions at the Former Johnny M Mine, McKinley County, New Mexico." As we are learning through other investigations in the Grants area, mine water discharge to soils have resulted in the anthropogenic concentrations of naturally occurring constituents which can act as a continuing source of contamination during moisture infiltration (rain and snow melt).